

CHARLES C. RAINEY, ESQ.
 Nevada Bar No. 10723
 crainey@hamricklaw.com
 HAMRICK & EVANS LLP
 7670 W. Lake Mead Blvd., Ste. 140
 Las Vegas, Nevada 89128
 +1.702.425.5100 (ph)
 +1.818.763.2308 (fax)

Attorney for Plaintiff
 LHF Productions, Inc.,
 a Nevada Corporation

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LHF PRODUCTIONS, INC., a Nevada
 Corporation,

Plaintiff,
 vs.

BRIAN KABALA, an individual.
 Defendants.

And related counter-claims

Case No.: 2:16-cv-02028-JAD-NJK

**STIPULATION AND ORDER TO EXTEND
 THE PLAINTIFF'S DEADLINE TO
 RESPOND TO DEFENDANT'S MOTION
 TO COMPEL**

[SECOND REQUEST]

COMES NOW Plaintiff LHF PRODUCTIONS, INC. ("Plaintiff") and Defendant BRIAN KABALA ("Defendant"), by and through their respective counsel of record, and hereby stipulate and agree to extend the time by which the Plaintiff must respond to the Defendant's Motion to Compel Written Discovery Responses, filed on January 30, 2018 [ECF No. 112] (the "Motion to Compel"), agreeing as follows:

///

///

///

///

PROCEDURAL BACKGROUND

1
2 1. On January 30, 2018, Defendant filed the Motion to Compel, thereby rendering
3 the Plaintiff's response due by February 13, 2018.

4 2. The Plaintiff and Defendant now hereby stipulate to extend the deadline for the
5 Plaintiff to respond to the Motion to Compel to Tuesday, February 20, 2018.

6 3. This is the **Second Request** for any extension of any of the foregoing deadlines;
7 the parties submitted a stipulation yesterday with an identical request (ECF No. 122); however,
8 the Court denied the request **without prejudice**, because it had been submitted concurrently in
9 the same filing as a request to extend another deadline.

10 4. On February 13, 2017, the parties timely filed a stipulation with respect to this
11 extension; however, as noted above, the Court denied the stipulation, noting its previously stated
12 position that requests for multiple forms of relief be submitted in separate filings [ECF 123;
13 *citing* ECF 97].

14 5. The parties apologize for previously filing this request concurrently with another
15 request for extension of a responsive deadline; the parties had read the Court's order of
16 November 15, 2017 and its citation to LR IC 2-2(b) as more narrowly applying to situations
17 where a motion or stipulation seeks multiple forms of relief to be separately decided by the
18 Magistrate and District Judges, as opposed to situations seeking multiple forms of identical
19 relief; in the future, the parties will take the necessary measures to comport with the Court's
20 ruling and avoid filing for multiple requests for relief in the same filing.

21 6. Nonetheless, based upon the foregoing, the parties agree that the 1-day delay in
22 filing the present stipulation was due to excusable neglect and should in no way affect the
23 Court's decision whether to grant the extension requested herein.

24 7. This request is made in good faith and not made for the purpose of undue delay.

GOOD CAUSE STATEMENTS

25
26 8. Plaintiff seeks additional time to respond to the Motion to Compel, noting that
27 Plaintiff's counsel has suffered certain medical conditions in recent weeks that have caused him
28

1 to miss several days of work in the intervening time since the filing of Defendant's Motion to
2 Compel and further disrupt his intended work schedule.

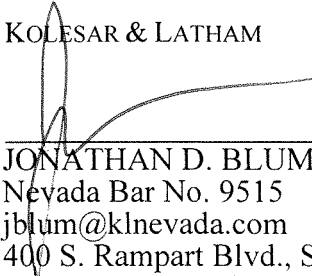
3 WHEREFORE, subject to the Court's approval below, Plaintiff LHF PRODUCTIONS,
4 INC. and Defendant BRIAN KABALA hereby stipulate and agree to extend the deadline for the
5 Plaintiff to respond to the Motion to Compel from Tuesday, February 13, 2018 to Tuesday,
6 February 20, 2018, and Defendant's deadline to file his Reply brief be similarly extended.

7 Respectfully submitted February 14, 2018

8
9 HAMRICK & EVANS LLP

10 /s/ Charles C. Rainey
11 CHARLES C. RAINEY, ESQ.
12 Nevada Bar No. 10723
13 crainey@hamricklaw.com
14 7670 W. Lake Mead Blvd., Ste. 140
Las Vegas, Nevada 89128
+1.702.425.5100 (ph)
Attorney for Plaintiff,
LHF Productions, Inc.

KOLESAR & LATHAM


JONATHAN D. BLUM, ESQ.
Nevada Bar No. 9515
jblum@klnevada.com
400 S. Rampart Blvd., Ste. 400
Las Vegas, Nevada 89145
+1.702.362.7800 (ph)
Attorney for Defendant,
Brian Kabala

15 **ORDER**

16 Based on the parties' stipulation [ECF No. 124] and good cause appearing, IT IS HEREBY
17 ORDERED that the Deadline for the Plaintiff to respond to the Defendant's pending Motion to
18 Compel is hereby extended to Tuesday, February 20, 2018, and Defendant's deadline to file his
19 Reply brief is hereby similarly extended.

20 **IT IS SO ORDERED.**

21 Dated: February 15, 2018 _____

22
23 
24 UNITED STATES MAGISTRATE JUDGE
25
26
27
28